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July 14, 2015

**BY FAX (973-776-7865)**

The Honorable Cathy L. Waldor  
United States Magistrate Judge  
Martin Luther King Building  
& United States Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

SO ORDERED

*s/Cathy L. Waldor*  
Cathy L. Waldor, U.S.M.J.

Date: 7/14/15

Re: United States v. John Bennett, No. 09 Cr. 656 (SDW)

Dear Judge Waldor:

On behalf of our client John Bennett, we write to request modifications to his bail conditions as set forth below. We have discussed these requests with the government, and the government consents to these modifications.

First, Mr. Bennett is required to report to his Immigration and Customs Enforcement supervising officer this Wednesday, July 15, 2015 at 9:00am. The field office where he must report is located in San Bernardino, California, which is approximately seventy-five minutes by car from where Mr. Bennett is located in Palm Desert. We therefore request that Mr. Bennett be allowed to leave his home at 7:00am on July 15—three hours before the start of his curfew currently allows—so that he can arrive timely for ICE reporting. He will return to Palm Desert before the regular end of his curfew at 7:00pm.

Second, the following Sunday, July 19, 2015, is Mr. Bennett's fifty-seventh wedding anniversary with his wife, Anne. Mrs. Bennett has arranged to spend this week through next Monday in Palm Desert with Mr. Bennett to celebrate their anniversary together before she is

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The Honorable Cathy L. Waldor

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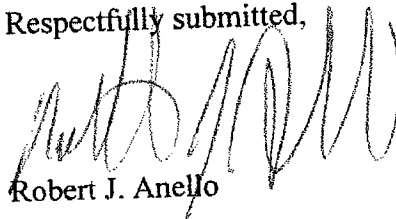
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required to return to Canada on July 20 because her visa runs out. We therefore request that Mr. Bennett's curfew be extended from 7:00pm until midnight on Sunday, July 19, so that he can celebrate his anniversary with his wife.

Finally, we request that Mr. Bennett be allowed to travel to the Southern District of New York in order to meet with counsel, departing Palm Desert on July 20, 2015, and departing New York on July 23, 2015 to return to Palm Desert.

Thank you for your attention to this matter.

Respectfully submitted,



Robert J. Anello

cc: Helen Christodoulou, Esq. (by email)  
Mikhail Vanyo, Esq. (by email)  
Daniel Tracer, Esq. (by email)  
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